

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**LATOYA BROWN; LAWRENCE BLACKMON  
HERBERT ANTHONY GREEN; KHADAFY MANNING;  
QUINETTA MANNING; MARVIN MCFIELD; NICHOLAS  
SINGLETON; STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER, individually and on  
behalf of a class of all other similarly situated,**

**PLAINTIFFS**

**VS.**

**CIVIL ACTION NO. 3:17-cv-347 WHB LRA**

**MADISON COUNTY, MISSISSIPPI; SHERIFF  
RANDALL C. TUCKER, in his official capacity; and  
MADISON COUNTY SHERIFF'S DEPUTIES JOHN  
DOES #1 through #6, in their individual capacities,**

**DEFENDANTS**

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**UNOPPOSED MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL**

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Defendants, Madison County, Mississippi, and Sheriff C. Randall Tucker (collectively “Defendants”), by and through counsel, move the Court for leave to file their Statement of Facts and attached Exhibits A and B, which support their [Dkt. #210] Memorandum in Support of Motion for Summary Judgment as to Individual and Class Based Claims of Plaintiff, Latoya Brown, under seal and in support hereof would show unto the Court the following:<sup>1</sup>

1. On March 7, 2018, Defendants filed a [Dkt. #210] Memorandum Brief in Support of their [Dkt. # 209] Motion for Summary Judgment as to Individual and Class Based Claims of Plaintiff, Latoya Brown in this matter. The Statement of Facts for Defendants’ Memorandum relies on portions of Latoya Brown’s deposition (Exhibit A) and her Supplemental Responses and Objections to Interrogatories (Exhibit B) she provided to Defendants. Latoya Brown’s

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<sup>1</sup> Defendants respectfully request that this Court waive the requirement of a Memorandum Brief in Support of this motion given the simplicity and clarity of the relief Defendants seek.

deposition transcript and her Supplemental Interrogatory Responses cannot be attached to Defendants' filed Memorandum because either portions of or all of these discovery pleadings have been marked "confidential" by her counsel of record pursuant to the stipulated protective order entered by the Court. *See* [Dkt. #32].

2. Defendants respectfully request that the Court allow their Statement of Facts and its attached Exhibits to be conventionally filed under seal because sealing is consistent with the protected nature of these documents, as Plaintiffs' counsel have designated specific portions of Brown's deposition and her entire Supplemental Responses and Objections to Defendants' Interrogatories as confidential pursuant to the stipulated protective order.

3. Counsel for Defendants have conferred with the attorneys for Plaintiffs and have confirmed that they do not oppose the sealing of the Statement of Facts, along with its Exhibits.

WHEREFORE, Defendants respectfully request that the Court enter an order allowing the conventional filing under seal of their Statement of Facts with accompanying Exhibits, which support Defendants' Memorandum in Support of Motion for Summary Judgment as to Individual and Class Based Claims of Plaintiff, Latoya Brown.

This the 7<sup>th</sup> day of March, 2018.

Respectfully submitted,

**MADISON COUNTY, MISSISSIPPI and  
SHERIFF RANDALL C. TUCKER, IN  
HIS OFFICIAL CAPACITY**

By: /s/ Rebecca B. Cowan  
Rebecca B. Cowan (MSB #7735)

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**CERTIFICATE OF SERVICE**

I, Rebecca B. Cowan, do hereby certify that I have this day, electronically filed the above and foregoing with the Clerk of the Court using the ECF system which will automatically provide e-mail notification of said filing upon the following:

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So, certified this the 7<sup>th</sup> day of March, 2018.

/s/ Rebecca B. Cowan  
Rebecca B. Cowan